

# Exhibit G

JR

**From:** Jeffrey Risman [jrisman@risman-law.com](mailto:jrisman@risman-law.com)  
**Subject:** Re: Markets Group  
**Date:** January 23, 2019 at 4:34 PM  
**To:** Jonathan Wallace [jwallace@ratschko.com](mailto:jwallace@ratschko.com)  
**Cc:** Ms. Imke Ratschko, Esq. [iratschko@ratschko.com](mailto:iratschko@ratschko.com)

Jonathan:

Hope that you are well. My apologies for the delayed response, I had jury duty yesterday. The Court's last Order of November 15, 2018 clearly defined deadlines for document production any fact discovery, January 2, 2019 and February 15, 2019, respectively. As you may recall, Magistrate Judge Lehrburger stated that those dates were final. As such, neither party can unilaterally extend those dates or stay discovery without approval of the Court. Therefore, I respectfully request that Plaintiff advise as to when both Mr. Adam Raleigh and Mr. Timothy Raleigh are available to testify, so that depositions could proceed before the close of discovery. I am available to discuss potential dates the remainder of today and all of tomorrow. That conversation will satisfy Magistrate Judge Lehrburger's "meet and confer" rule, which is a condition precedent in the event that Defendant must move to compel the depositions of the Plaintiff, if Plaintiff does not comply with the previous Order of the Court.

Contrary to your assertion, Defendant has not withheld any responsive and relevant documentation in this action. It is our position that the document you produced solely to the Court is completely irrelevant to this case. If Plaintiff is in possession of documentation that is responsive and relevant to Defendant's Request for Production of Documents, they must be immediately exchanged pursuant to both Rule 26 and Rule 37.

Lastly, Plaintiff is required to produce witnesses pursuant to Defendant's Notice of 30(b)(6) Deposition, which was served on January 2, 2019.

Please advise of your earliest availability discuss all the matter above. Thank you.

Best Regards,

Jeffrey Risman, Esq.  
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On Jan 22, 2019, at 9:55 AM, Jonathan Wallace <[jwallace@ratschko.com](mailto:jwallace@ratschko.com)> wrote:

Jeffrey we have raised the issue with the magistrate that your client has withheld substantial discovery. Naturally, we cannot officially depose your client without all documentation in hand. Long after we raised this issue, you have still made no offer to investigate or report back to us with regard to withheld documents. We think the better procedure would be to set deposition dates when outstanding discovery issues are resolved.

That said, we are conferring with our client about dates, and will further respond to you shortly, subject to efforts to place this before the magistrate and receive a ruling on these issues before depositions actually occur.

On Jan 21, 2019, at 6:56 PM, Jeffrey Risman <[jrisman@risman-law.com](mailto:jrisman@risman-law.com)> wrote:

Imke:

Again, these disclosures were not produced in accordance with the Court's last Order of November 15, 2018. Also, neither you nor Jonathan have responded to my requests for your clients' availability for depositions.

Best Regards,

[Jeffrey Risman, Esq.](http://www.risman-law.com)

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On Jan 21, 2019, at 6:48 PM, Imke Ratschko <[iratschko@ratschko.com](mailto:iratschko@ratschko.com)> wrote:

Attached are further disclosures.  
<[tax returns to produce.pdf](#)>

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